

1 John Chu (Bar No.: 104302)  
**CORPORATE COUNSEL LAW GROUP, LLP**  
2 25 Kearny Street, Suite 302  
San Francisco, CA 94108  
Telephone: 415-989-5300  
3 Email: [jchul49@yahoo.com](mailto:jchul49@yahoo.com)

4 Bing Zhang Ryan (Bar No.: 228641)  
**ZHANG LAW GROUP**  
5 2950 Buskirk Avenue, Suite 300  
Walnut Creek, CA 94597  
Telephone: (925) 257-3097  
6 Email: [bzhanglaw@gmail.com](mailto:bzhanglaw@gmail.com)

7 *Attorneys for Defendants and Counter-Claimants Benlin Yuan and Hong Lin*

8  
9 **UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

10 JINJU ZHANG, an individual,

11 Plaintiff,

12 vs.

13 BENLIN YUAN, an individual; HONG LIN, an  
individual; CAMIWELL, INC., a California  
14 corporation; CAMIWELL, INC. (CANADA), a  
Canadian corporation; BEIJING ASIACOM  
15 TECHNOLOGY CO. LTD., a Chinese  
corporation; ASIACOM AMERICAS, INC., a  
16 Virginia corporation; BANK OF AMERICA  
CORPORATION, a National Association; and  
17 DOES 1 to 20, inclusive,

18 Defendants.

19  
20 AND RELATED COUNTER-CLAIM

**Case No. 23-CV-5818-VC**

**PLAINTIFF'S AND DEFENDANTS'  
JOINT EXHIBIT LIST**

21  
22 Plaintiff Jinju Zhang ("Plaintiff") and Defendants and Counter-Claimants Benlin Yuan  
23 and Hong Lin ("Defendants") identify the following joint exhibits that they intend to offer into  
24

evidence at trial. This list does not include exhibits that may be offered for impeachment or rebuttal.

No.1	Description/Bates No.	Purpose and Sponsoring Witness	Stipulation to Admission?	Evidentiary Objection	Response to Objection	Court Use
1	Plaintiff's Notice of Deposition for Camiwell PMK, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant.  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to what was at issue in the State Action.  Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
2	Plaintiff's Request for Production to Camiwell, Set Two, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant.  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to what was at issue in the State Action.  Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to	

					RFP, served on Dec. 22, 2024.	
3	Plaintiff's Request for Production to Yuan and Lin, Set Two, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant.  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to what was at issue in the State Action.  Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
4	Plaintiff's Request for Production to Yuan and Lin, Set One, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant.  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to what was at issue in the State Action.  Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	

5	Plaintiff's Special Interrogatories to Yuan and Lin, Set One, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant.  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to what was at issue in the State Action.  Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
6	Plaintiff's Special Interrogatories to Camiwell, Set One, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant.  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to what was at issue in the State Action.  Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
7	Plaintiff's Request for Production to Camiwell, Set One, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant.  Failed to produce in response to Plaintiff's	Relevant to what was at issue in the State Action.	

				Request for Production of Documents served on Nov. 18, 2024	Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
8	Email exchanges among counsel in the State Action, 9/27/2023 – 10/13/2023	State Action Settlement; Padmini Cheruvu	No.	Irrelevant. Hearsay  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to show Plaintiff agreed to settle the dispute.  Not hearsay. Cheruvu can testify.  Defendants used this exhibit in Cheruvu deposition. Plaintiff did not ask for such information during discovery.	
9	Notice of Acceptance – Yuan and Lin's 998 Offer, State Action, 9/6/2023	State Action Settlement; Benlin Yuan	No.	Irrelevant.  Failed to produce in response to Plaintiff's	Relevant to show when Plaintiff accepted	

				Request for Production of Documents served on Nov. 18, 2024	the 998 offers.  Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
10	Notice of Acceptance – Camiwell’s 998 Offer, State Action, 9/6/2023	State Action Settlement; Benlin Yuan and Marie Quashnock	No.	Irrelevant.  Failed to produce in response to Plaintiff’s Request for Production of Documents served on Nov. 18, 2024	Relevant to show when Plaintiff accepted the 998 offers.  Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
11	Deposition Transcript, Marie Quashnock, 2/3/2025	State Action Settlement; Marie Quashnock	Yes.			
12	Lin Deposition Exhibit 3 – 11/24/2018	Camiwell, Inc. dissolution;	Yes.			

	Shareholder Meeting Minutes	Benlin Yuan and Hong Lin				
13	Yuan Deposition Exhibit 24 – Complaint, the State Action	State Action; Benlin Yuan	Yes.			
14	Yuan Deposition Exhibit 31 – BOA September 2023 bank statement	Fund withdrawals; Benlin Yuan	Yes.			
15	Zhang Deposition Transcript, 8/7/2023, State Action	Shareholder distribution; Jinju Zhang	No.	Irrelevant.  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution.  Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
16	Yuan Deposition Exhibit 29 – Judgment, State Action	State Action Judgment; Benlin Yuan	Yes.			
17	Camiwell 998 Offer Calculation	State Action settlement; Benlin Yuan	No.	Irrelevant.  Hearsay  Lack of Foundation  Failed to produce in	Relevant to show what Camiwell 998 offer consisted of	

				response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Benlin Yuan can testify.  Plaintiff did not seek such information during discovery.	
18	Camiwell 998 Offer	State Action settlement; Benlin Yuan	Yes			
19	Yuan and Lin 998 Offer	State Action settlement; Benlin Yuan	Yes			
20	Camiwell 2020 bank statements - Bank of America 0628	Shareholder distribution; Benlin Yuan	No.	Irrelevant.  Hearsay  Lack of authentication  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution  Plaintiff has access to such information and did not ask for such information during discovery.	
21	Camiwell 2021 bank statements - Bank of America 0628	Shareholder distribution; Benlin Yuan	No.	Irrelevant.  Hearsay	Relevant to shareholder distribution  Plaintiff has access to	



				Lack of authentication  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	such information and did not ask for such information during discovery.	
22	Camiwell 2022 bank statements - Bank of America 0628	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay  Lack of authentication  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution  Plaintiff has access to such information and did not ask for such information during discovery.	
23	Camiwell 2023 bank statements - Bank of America 0628	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay  Lack of authentication  Failed to produce in response to Plaintiff's	Relevant to shareholder distribution  Plaintiff has access to such information and did not ask for such information	

				Request for Production of Documents served on Nov. 18, 2024	during discovery.	
24	Camiwell 2020 bank statements – Chase 1129	Shareholder distribution; Benlin Yuan	No.	Irrelevant.  Hearsay  Lack of authenticatio n  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution  Plaintiff has access to such information and did not ask for such information during discovery.	
25	Camiwell 2021 bank statements – Chase 1129	Shareholder distribution; Benlin Yuan	No.	Irrelevant.  Hearsay  Lack of authenticatio n  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution  Plaintiff has access to such information and did not ask for such information during discovery.	

26	Camiwell 2022 bank statements – Chase 1129	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay  Lack of authentication  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution  Plaintiff has access to such information and did not ask for such information during discovery.	
27	Camiwell 2020 bank statements - Bank of America 4390	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay  Lack of authentication  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution  Plaintiff has access to such information and did not ask for such information during discovery.	
28	Camiwell 2021 bank statements - Bank of America 4390	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay	Relevant to shareholder distribution  Plaintiff has access to such	

				Lack of authentication  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	information and did not ask for such information during discovery.	
29	Camiwell 2022 bank statements - Bank of America 4390	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay  Lack of authentication  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution  Plaintiff has access to such information and did not ask for such information during discovery.	
30	Camiwell 2023 bank statements - Bank of America 4390	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay  Lack of authentication  Failed to produce in response to Plaintiff's	Relevant to shareholder distribution  Plaintiff has access to such information and did not ask for such information	

				Request for Production of Documents served on Nov. 18, 2024	during discovery.	
31	Camiwell Inc. Bylaws	Zhang's share percentage: Benlin Yuan	Yes.			
32	Written Consent of Shareholders to Voluntarily Wind Up and Dissolve	Zhang's share percentage and dissolution: Benlin Yuan	No.	Hearsay  Lack of authenticatio n  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Benlin Yuan can testify. Not hearsay.  Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
33	Share Transfer Agreement	Zhang's share percentage: Benlin Yuan	Yes.			
34	Notice of Commencement of Voluntary Dissolution	Zhang's share percentage and dissolution: Benlin Yuan	No.	Hearsay  Lack of authenticatio n  Failed to produce in response to Plaintiff's Request for	Benlin Yuan can testify. Not hearsay.  Defendants identified all pleadings and discovery	

				Production of Documents served on Nov. 18, 2024	in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
35	Certificate of Election to Wind Up and Dissolve	Zhang's share percentage and dissolution: Benlin Yuan	Yes			
36	Share Purchase Agreement – Hong Lin	Zhang's share percentage: Benlin Yuan	Yes.			
37	Share Purchase Agreement – Benlin Yuan	Zhang's share percentage: Benlin Yuan	Yes.			
38	Share Purchase Agreement – Jinju Zhang	Zhang's share percentage: Benlin Yuan	Yes.			
39	Amended Notice of Acceptance – Yuan and Lin 998 offer	State Action settlement; Benlin Yuan	Yes.			
40	Amended Notice of Acceptance – Camiwell	State Action settlement; Benlin Yuan	Yes.			
41	Camiwell CPA Invoice	Camiwell, Inc. debt; Benlin Yuan; Chenying Fan; Hui Sun	No.	Irrelevant Hearsay  Lack of authentication	Relevant to shareholder distribution.  Chenying Fan and Hui Sun can testify.	

				Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Defendants used this exhibit in Hui Sun deposition.  Plaintiff never asked for such information during discovery.	
42	Statement of Information filed on 7/11/2023	Camiwell, Inc. shareholders; Benlin Yuan	Yes.			
43	Hui Sun Invoice	Camiwell debt; Benlin Yuan ; Hui Sun	No.	Irrelevant.  Hearsay  Lack of authentication  Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution.  Hui Sun can testify. Defendants used this exhibit in Hui Sun deposition.  Plaintiff never asked for such information during discovery.	
44	Yuan paid CPA Invoice	Camiwell, Inc. debt; Benlin Yuan; Hui Sun; Chenying Fan	No.	Irrelevant  Hearsay  Lack of authentication	Relevant to shareholder distribution.  Chenying Fan, Hui Sun and Benlin	

				Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Yuan can testify.  Defendants used this exhibit in Hui Sun deposition.  Plaintiff never asked for such information during discovery.	
45	Third Amended Counterclaim	Shareholder Distribution; Benlin Yuan	Yes.			
46	Camiwell 2020 Tax Return	Zhang's share percentage; Benlin Yuan	Yes			
47	Camiwell 2021 Tax Return	Zhang's share percentage; Benlin Yuan	Yes			
48	Camiwell 2022 Tax Return	Zhang's share percentage; Benlin Yuan	Yes			
49	Camiwell LLC DE Formation	Camiwell, LLC formation; Benlin Yuan	Yes			
50	Camiwell LLC CA registration	Camiwell, LLC formation; Benlin Yuan	Yes			



51	Statement of Conversion	Camiwell, Inc. formation; Benlin Yuan	Yes			
52	Deposition Transcript, Hong Lin, 2/5/2025	State Action settlement and Zhang's share percentage; Hong Lin	Yes			
53	Deposition Transcript, Benlin Yuan, 1/31/2025	State Action settlement and Zhang's share percentage; Benlin Yuan	Yes			
54	Deposition Transcript, Hui Sun, 2/10/2025	Zhang's share percentage; Hui Sun	Yes			
55	Deposition Transcript, Benlin Yuan, 8/3/2023	State Action; Benlin Yuan	Yes			
56	Deposition Transcript, Hong Lin, 8/2/2023	State Action; Hong Lin	Yes			
57	Deposition Transcript, Benlin Yuan, 8/4/2023	State Action; Benlin Yuan	Yes			
101	CAMiWell, Inc. Common Stock Purchase Agreement with Jinju Zhang	Zhang's share of ownership  Jinju Zhang	Yes			
102	CAMiWell, Inc., Common Stock Purchase Agreement with Hong Lin	Zhang's share of ownership  Jinju Zhang	Lack of foundation.		Hong Lin will testify as to its foundation	

103	CAMiWell, Inc., Common Stock Purchase Agreement with Benlin Yuan	Zhang's share of ownership  Jinju Zhang	Lack of foundation.		Benlin Yuan will testify as to its foundation.	
104	Email from Benlin Yuan dated Dec. 21, 2016	Shareholder distribution  Jinju Zhang	Yes			
105	Email from Benlin Yuan to Fanling Hu and Jinju Zhang dated March 14, 2017	Shareholder distribution  Jinju Zhang	Yes			
106	Email to Benlin Yuan from Fanling Hu dated November 27, 2017	Shareholder distribution  Jinju Zhang's share of ownership  Jinju Zhang	Lack of foundation.		Benlin Yuan will testify as to its foundation.	
107	Email from Benlin Yuan to Junfei Li dated July 6, 2018	Jinju Zhang's share of ownership.  Jinju Zhang	Yes			
108	Email from Benlin Yuan to Fanling Hu dated July 31, 2018	Jinju Zhang's share of ownership.  Jinju Zhang	Yes			
109	Email from Benlin Yuan to Fanling Hu, copied to Jinju Zhang and Hong Lin dated October 4, 2018	Jinju Zhang's share of ownership.	Yes			

		Jinju Zhang				
110	Letter dated April 14, 2021 from SingerLewak to Benlin Yuan	Jinju Zhang's share of ownership. Jinju Zhang	Yes			
111	Letter from Chenying Fan again to Benlin Yuan	Jinju Zhang's share of ownership. Jinju Zhang	Yes			
112	April 26, 2023 letter from Chenying Fan to Benlin Yuan	Jinju Zhang's share of ownership. Jinju Zhang	Yes			
113	Amended Notice of Acceptance by Plaintiff Jinju Zhang of Defendant CAMiWell, Inc., CCP Section 998 offer to Compromise	Jinju Zhang's share of ownership. Jinju Zhang	Yes			
114	Amended Notice of Acceptance by Plaintiff Jinju Zhang of Defendants Benlin Yuan and Hong Lin's CCP Section 998 Offer to Compromise	Jinju Zhang's share of ownership. Jinju Zhang	Yes			
115	Judgment in Favor of Plaintiff Jinju Zhang and against Defendant CAMiWell, Inc. Pursuant to Code of Civil Procedure 998 to Compromise	Jinju Zhang's share of ownership. Jinju Zhang	Yes			

116	Bank statement from CAMiWell, Inc. for September 1, 2023 to September 30, 2023	Withdrawal of funds by Benlin Yuan  Jinju Zhang	Lack of authenticity  Lack of foundation			
117	Email threads between Quashnock and Cheruvu dated Oct. 12 - 20, 2023	Unauthorized Withdrawal of funds by Benlin Yuan  Jinju Zhang	Lack of foundation		It lays foundation for Plaintiff's claim for unauthorized withdrawal of funds by Benlin Yuan	
118	Email threads between Quashnock and James Cai dated Nov. 7, 2023	Unauthorized Withdrawal of funds by Benlin Yuan  Marie Quashnock	Yes			
119	E-mail thread dated January 28, 2020 between Bing Zhang Ryan and Padmini Cheruvu	Authenticity of corporate documents of Camiwell, Inc.  Padmini Cheruvu	Yes			
120	E-mail string dated February 26, 2020 between Bing Zhang Ryan and Padmini Cheruvu	Authenticity of corporate documents of Camiwell, Inc.	Yes			

		Padmini Cheruvu				
121	Exchange Documents Table Exchange Documents Table (Bates Number PC000181)	Authenticity of corporate documents of Camiwell, Inc.  Padmini Cheruvu	Lack of foundation		It lays the foundation for Ms. Cheruvu to authenticate the corporate documents received from Bin Zhang Ryan	
122	Declaration of Benlin Yuan in Support of Defendants Benlin Yuan and Hong Lin's Motion for Summary Judgment	Jinju Zhang's share of ownership and withdrawal of funds by Benlin Yuan  Benlin Yuan	Yes			
123	Deposition transcript of Marie Quashnock	Jinju Zhang's share of ownership and withdrawal of funds by Benlin Yuan  Marie Quashnock	Yes			
124	Deposition transcript of Padmini Cheruvu	Authenticity of corporate documents of Camiwell, Inc.  Jinju Zhang's share of ownership and withdrawal of	Yes			

		funds by Benlin Yuan				
		Marie Quashnock				
125	Waiver of Notice and Consent to Unanimous Written Consent in Lieu of Holding First Meeting of Board of Directors dated June 16, 2018	Authenticity of corporate documents.  Jinju Zhang	Lack of foundation		It lays foundation for Jinju Zhang to authenticate Camiwell's corporate documents.	
126	Secretary of State Certificate of Election to Wind Up and Dissolve	Dissolution of Camiwell, Inc.  Benlin Yuan and Hong Lin	Yes			

Defendants reserve the right to add additional exhibits as a result of any witness testimony offered by Plaintiff, to add additional impeachment or rebuttal exhibits, and to withdraw any of the above-mentioned exhibits.

Dated: 04/09/2025

/James Cai/

Attorney for Plaintiff

Dated: 04/09/2025

/Bing Zhang Ryan/

Attorney for Defendants and Counter-Claimants

1 **CERTIFICATE OF SERVICE**

2 I, Christina Ayala, declare:

3 I am a resident of the State of California and over the age of eighteen years, and not a party  
4 to the within action; my business address is 1754 Technology Drive., Suite 122, San Jose, CA  
95110. On April 09, 2025, I served the following documents:

5 **- PLAINTIFF'S AND DEFENDANTS' JOINT EXHIBIT LIST**

6 On the party (ies) in this action, through his/her/their attorneys of record, by placing true and  
7 correct copies thereof in sealed envelope(s), addressed as shown on the attached Service List for  
service as designated below:

8 ☐ **By US Mail** I placed, on the date shown below, at my place of business, a true  
9 copy thereof, enclosed in a sealed envelope, with postage fully pre-paid, for collection  
and mailing with the United States Postal Service where it would be deposited with the  
United States Postal Service that same day in the ordinary course of business, addressed  
to those listed on the attached Service List.

10 ☐ **(By Overnight Delivery)** I enclosed the listed documents in an envelope or  
11 package provided by carrier and addressed to the person(s) listed on the attached  
service. I placed the envelope or package for collection and overnight delivery at  
12 an office or a regularly utilized drop box of the overnight delivery carrier.

13 ☒ **(By Electronic Service)** based on an agreement of the parties to accept  
14 service by electronic transmission. I caused the documents to be sent to the person(s)  
at the electronic notification addresses listed on attached service list, I did not receive  
15 within a reasonable time after the transmission and electronic message or other  
indication that the transmission was unsuccessful.

16 I am readily familiar with the firm's practice of collection and processing correspondence  
17 for mailing. Under that practice it would be deposited with the U.S Postal Service on that  
same day with postage thereon fully prepaid in the ordinary course of business. I am aware  
18 that on motion of the party served, service is presumed invalid if postal cancellation date or  
postage meter date is more than one day after date of deposit for mailing in affidavit.

19 I declare under penalty of perjury under the laws of the State of California that the above is  
20 true and correct. Executed in San Jose, California on **April 09, 2025**.

21 *Christina Ayala*  
22 **Christina Ayala**

**SERVICE LIST**

John Chu (SBN: 104302)  
Corporate Counsel Law  
Group LLP  
25 Keamy Street, Suite 302  
San Francisco, CA 94108  
Telephone: 415-989-5300  
Fax: 415-788-4315  
Email: [jchu149@yahoo.com](mailto:jchu149@yahoo.com)

**Attorney for Defendants; Benlin Yuan  
and Hong Lin, and Counterclaimant  
Benlin Yuan**

Bing Zhang Ryan  
Zhang Law Ryan  
2950 Buskirk Avenue Suite 300  
Walnut Creek, CA 94563  
Telephone: 925-257-3097  
Email: [bzhanglaw@gmail.com](mailto:bzhanglaw@gmail.com)

**Attorney for Defendant; Benlin Yuan**

Austin B. Kenney (SBN: 242277)  
Megan N. Aldworth (SBN: 351462)  
Severson & Werson  
19100 Von Karma Ave. Suite 700  
Irvine, CA 92612  
Telephone: 949-442-7110  
Email: [abk@serverson.com](mailto:abk@serverson.com)  
[mna@serverson.com](mailto:mna@serverson.com)

**Attorney for Defendant and Counter-  
Claimant; Bank of America, N.A.**

Michael T. Beuselinck (SBN: 251991)  
Michael T. Beuselinck, P.C.  
490 43<sup>rd</sup> Street #37  
Oakland, CA 94609  
Telephone: 925-800-3032  
Email: [mike@lawmtb.com](mailto:mike@lawmtb.com)

**Attorney for Defendant; Asiacom  
Americas, Inc.**